

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA**

In re:

Case No. 22-50035-JPS

Teri Galardi,

Chapter 11

Debtor,

THOMAS T. MCCLENDON,
AS LIQUIDATING TRUSTEE
OF THE GALARDI CREDITORS TRUST,

Contested Matter

Movant,

v.

ASTRID E. GABBE,

Respondent.

**AFFIDVIT IN OPPOSITION TO LIQUIDATING TRUSTEE'S
OBJECTION TO CLAIM NO. 57 OF ASTRID E. GABBE [ECF 428]**

STATE OF FLORIDA)
COUNTY OF BROWARD)

I, Astrid E. Gabbe, Esq. state:

1. That I am over the age of 18.
2. That I have personal knowledge of the facts contained in this affidavit and the Objection to Claim No. 57 [ECF 428].
3. That I am a duly licensed Florida attorney in continuous good standing since April 18, 2003.

4. That I did file a proof of claim [Claim No. 57] to memorialize my duly recorded attorney charging lien of \$163,956.32, attached hereto as Exhibit 1, against my former client, Alexis King, for whom I obtained a Final Judgment in the amount of \$468,446.62 against Debtor Teri Galardi on September 20, 2021.¹ The charging lien was filed on March 17, 2022 and is uncontested.

5. That I filed a charging lien because I had not been paid by my former client and under Florida law, a former attorney's charging lien is enforceable against a defendant. *Sinclair, Louis, Siegel, Heath, Nussbaum & Zavertnik, P.A. v. Baucom*, 428 So. 2d 1383, 1385 (Fla. 1983). Thus, in order to collect from Defendant Galardi, now Debtor Galardi, I was required to file a proof of claim in Debtor Galardi's bankruptcy which I did.

6. That Ms. King also filed a proof of claim in the amount of \$468,446.62 [Claim No. 110] instead of the correct amount of \$304,490.30 in a transparent attempt to intercept my fees.

7. That the Court should overrule the objection and reduce Claim 110 to \$304,490.30 and then the total for the two proofs of claim is the correct amount of \$468,446.62 and not duplicative.

8. That I do not want my money being paid to Ms. King/Red Shield Funding and must be paid directly by the Liquidating Trustee, if determined to be a Class 8 claim or by Teri Galardi if my claim is ruled a Class 10 secured claim which it should be.

FURTHER AFFIANT SAYETH NAUGHT

Pursuant to Fla. Stat. 92.525, 28 U.S. Code § 1746 and under penalty of perjury, I declare that I have read the foregoing Affidavit and the Objection [ECF 428] and that the facts are true, correct and based on my personal knowledge.

/s/ Astrid E. Gabbe, Esq.
Astrid E. Gabbe, Esq.

¹ Ms. King assigned the Final Judgment and proof of claim no. 110 to Red Shield Funding.

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
Case No. 20-20592-CIV-COOKE-DAMIAN**

PORSCHE DARDEN *et. al*,

Plaintiffs

v.

FLY LOW, INC. AND TERI GALARDI,

Defendants

**CORRECTED NOTICE OF FILING AND ASSERTING CHARGING LIEN
BY THE LAW OFFICES OF ASTRID E. GABBE, P.A.
FOR ATTORNEYS' FEES AND COSTS**

NOTICE IS GIVEN that The Law Office of Astrid E. Gabbe, P.A. ("AG") asserts an attorney's charging lien on the Final Judgment entered in the above-captioned proceeding, to Plaintiff Alexis King ("King") [Doc. 37] and on all money due from defendants on such judgment, and any and all assets, property, money or proceeds retained, received or recovered by King, or any of her assigns in connection with this Final Judgment. This charging lien claims attorney's fees and costs due AG for legal services rendered to King in this proceeding. To date, nothing has been paid to the undersigned and \$163,956.32 is due to AG.

Former Attorneys for Alexis King

Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
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Interested Party

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EXHIBIT 1

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing was served via CM/ECF, email and/or First Class U.S. Mail to the parties on the attached service list as indicated on this 17th day of March, 2022.

Former Attorneys for Alexis King

Astrid E. Gabbe
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SERVICE LIST

Served via CM/ECF

All parties of record

Served via Email

Alexis King Alexisking717@icloud.com

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA**

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ASTRID E. GABBE,

Respondent.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of June 2023 a true and correct copy of the foregoing was mailed to the Clerk of Court for electronic filing, which will electronically serve a copy of the foregoing document on all parties of record and was emailed directly to parties of record by the undersigned.

Respectfully submitted,

/s/ Astrid E. Gabbe

The Law Office of Astrid E. Gabbe, P.A.

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SERVICE LIST

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All parties of record



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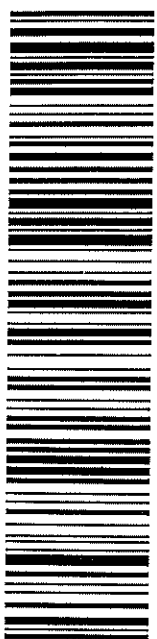
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ASTRID E. GABBE
P.O. BOX 4216
HOLLYWOOD FL 3308

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Middle District of Georgia

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U.S. BANKRUPTCY
MIDDLE DISTRICT OF
MACON, GA 3120

Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL